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9  
10 IN THE UNITED STATES BANKRUPTCY COURT  
11  
12 FOR THE DISTRICT OF ARIZONA

13  
14 In re: ) Case No.: 2-17-bk-04023-BKM  
15 DANIELLE MARIE PETERSON, ) In Proceedings Under Chapter 13  
16 and )  
17 AARON JAMES PETERSON, ) **SECOND MOTION FOR THIRTY (30)**  
18 Debtor(s). ) **DAY EXTENSION TO COMPLY WITH**  
19 ) **TRUSTEE'S EVALUATION AND**  
20 ) **RECOMMENDATION(S) REPORT WITH**  
21 ) **NOTICE OF POTENTIAL DISMISSAL IF**  
22 ) **CONDITIONS ARE NOT SATISFIED RE:**  
23 ) **AMENDED CHAPTER 13 PLAN (Case**  
24 ) **Docket #11) ... and NOTICE OF BAR**  
25 ) **DATE TO OBJECT TO THE SAME**

26  
27 NOW COMES Petitioner(s), DANIELLE MARIE PETERSON and AARON JAMES  
28 PETERSON, (hereinafter "Movant(s)") by and through counsel, who moves the Court to  
29 grant a thirty (30) day extension to respond with the " Trustee's Evaluation and  
30 Recommendation Report ...", case docket number 18, (hereinafter "Recommendation")  
31 and present a proposed confirmation order to the Chapter 13 Trustee. The grounds for  
32 this request are set forth within the Memorandum below.

33  
34 RESPECTFULLY SUBMITTED this 20th day of November, 2017.

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36 Allegrucci Law Office, PLLC

37  
38 /s/ David Allegrucci  
39 Attorney for Petitioner(s)

## MEMORANDUM

1. Since the date of the last hearing on this case undersigned counsel has been involved in the following matters:

- Was a court appointed arbitrator in case number CV2016-90817 for a hearing held on September 13, 2017.
- Prepared for a trial scheduled on September 18, 2017 in case number CC2016-086696 which settled 3 business days prior to trial.
- Prepared for trial in adversary number 2-16-ap-00327-DPC which was vacated as a result of the illness of the client.
- Drafted Motion in support of Application for Default in adversary number 2-16-ap-000249-MCW.
- Drafted brief in support of standing to continue with appeal on October 12, 2017 in AZ-16-1263-SKuf.
- Drafted and filed a contested response to a motion for stay relief in case number 2-15-bk-04538-GBN on October 18, 2017.
- Prepared for and attended oral argument in Appellate number AZ-16-1263 on October 26, 2017.
- Read Motion for Reconsideration and Additur and Objection thereto as court ordered arbitrator in CV2016-90817 and rendered Award on November 5, 2017.
- Filed Motion to Set Chapter 13 Trustee's objection to confirmation for hearing in 2:16-bk-12633-BMW on November 6, 2017.
- Drafted and filed a Reply Brief in Appellate number AZ-17-1215 on November 7, 2017.
- Drafted and filed Motion to set Trustee's Supplemental Recommendation for hearing in case number 2-15-bk-2060-EPB on November 13, 2017.
- Prepared for objection to confirmation order and attended Chapter 11 confirmation hearing in case number 2-16-06224-MCW on November 15, 2017.
- Prepared for trial and pretrial conference in US Tax Court case number 6037-17S. Matter settled on November 17, 2017.

2. During the aforementioned time period undersigned legal counsel prepared or submitted responses to plan recommendations to the Chapter 13 trustee plan assigned to the case in case(s) numbered 2-15-bk-07706-BMW and 2-15-00984-GBN.

3. A thirty (30) day continuance should allow the Movant(s) to sort out their new financial arrangements and ensure they have plan feasibility going forward.

4. During the next thirty (30) days, barring unforeseen events, the undersigned believes he can start working on the Recommendation.

WHEREFORE, based upon the foregoing, the Movant(s) pray that this Court:

a) grant him a thirty (30) day extension to respond to the Recommendation and submit a proposed confirmation order to the Chapter 13 Trustee;

b) grant such other and further relief as the Court  
deems just and equitable.

Allegrucci Law Office, PLLC

/s/ David Allegrucci  
Attorney for Defendant(s)

**NOTICE OF DEADLINE TO FILE OBJECTION TO MOTION**

NOTICE is given that Movant(s) have filed the foregoing Motion for Extension of Time.

5. Any objections to the Motion must be in writing, filed with the Clerk of the U.S. Bankruptcy Court, and copies served on the following parties no later than fourteen (14) days from the date of this Notice.

Clerk of the U.S. Bankruptcy Court  
230 North First Avenue, Suite 101  
Phoenix, AZ 85012

Danielle M. Peterson  
320 North 85th Street  
Mesa, AZ 85207  
Movant(s)

Mr. David Allegrucci  
ALLEGRUCCI LAW OFFICE, PLLC  
307 North Miller Road  
Buckeye, AZ 85326  
Attorney for Movant(s)

Aaron J. Peterson  
975 S. Royal Palm Rd., #E207  
Apache Junction, AZ 85119  
Movant(s)

6. If no objections are filed the Motion can be approved without a hearing.

7. If objections are filed, this Motion can be approved without a hearing provided that the Trustee and all objecting creditors agree to a stipulated approval order. If unable to so agree and stipulate, the Debtor's Attorney will give notice of a hearing to the Trustee.

DATED: November 20, 2017.

Allegrucci Law Office, PLLC

/s/ David Allegrucci  
Attorney for Movant(s)

Copy of the foregoing sent this 21st day of November, 2017 by first class U.S. Mail to the following:

Mr. Edward J. Maney  
Suite 1775  
101 North First Avenue  
Phoenix, AZ 85003  
Attorney for Trustee

/s/ David Allegrucci